

## **Summary of EPA's Draft Guidance on Setting Water Quality Criteria for Secondary Contact Recreation Uses**

The following is list of the key points made by USEPA in the Implementation Guidance for Ambient Water Quality Criteria for Bacteria (May 2002 Draft) regarding states setting criteria for a secondary contact recreation use:

- In section 4.5.3, USEPA indicates that after states have demonstrated through a Use Attainability Analysis (UAA) that primary contact recreation is not an existing use, states can set a secondary contact recreation use and water quality criteria to protect that use.
- EPA defines secondary contact activities as those where there is little contact with the water and ingestion of water is unlikely.
- EPA did not set numeric criteria for secondary contact recreation in their 1986 bacteriological criteria document because the data collected would be unsuitable for use in situations where exposure would be through other routes than the direct ingestion of water during swimming. Illnesses from secondary uses would just as likely be those that affect the eye, ear, skin, and upper respiratory tract (rather than gastroenteritis).
- EPA believes that although there is a lack of information necessary to develop a risk-based secondary contact recreation criterion, states should set numeric criteria to protect secondary contact uses.
- Reasons for adopting numeric criteria include providing the ability to develop effluent limitations and best management practices, providing a mechanism for protecting downstream uses, and assure primary contact recreation is not precluded if the secondary use is applied only seasonally.
- EPA suggests adopting a criterion that is 5 times that of the geometric mean component of the criterion adopted to protect primary contact recreation.
- States could evaluate attainment based on samples taken over a 30-day period, seasonally or annually.
- A narrative criterion could also be used.
- EPA allows alternative approaches and will work with states to develop protective criteria.